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November 25, 2019

Via Certified Mail

National FOIA Office
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (2310A)
Washington, DC 20472

Re: **Freedom of Information Act ("F.O.I.A.") Request**
Consolidated action: Munoz et al v. Intercontinental Terminals Co. LLC,
4:19-CV-01460

To Whom It May Concern:

This is a request for information pursuant to the Freedom of Information Act (5 U.S.C. § 552). It seeks records¹ in the possession custody and/or control of the Houston Emergency Center related² to:

(1) See *Exhibit A*.

The request includes information in whatever format it is held, including hard copy, digital or other electronic means. It also specifically includes, but is not limited to: (a) email information (recipient and sender address, subject and time sent); (b) internet information (sites visited and searches conducted); (c) cell phone information (incoming and outgoing number, length of call); and (d) Phone information (incoming and outgoing number, and length of call).

We are willing to pay fees for this request up to a maximum of \$300.00. If estimate the fees with exceed this limit, please inform me first.

¹ "Record" is defined to include, but not limited to: letters, correspondence, investigations, interviews, reports, statements, testimony, recordings, notes, data, memoranda, email, data, metadata, computer source and object code, technical manuals, technical specifications, maps, drawings, measurements, reference materials and/or any other materials.

² "Related to" means constituting, defining, concerning, embodying, reflecting, identifying, stating, referring to, dealing with or in any way involving.

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U.S. Environmental Protection Agency

Should you have any questions or concerns, please do not hesitate to contact our office. We look forward to working with you in processing this FOIA Request.

Sincerely,



J. Patrick L. Stephens

JPLS/nh
Enclosure

EXHIBIT A

1. All records related to the fires and accompanying release of toxic chemicals at the petrochemical terminal facility owned or operated by Intercontinental Terminals Company, LLC ("ITC") and/or Mitsui & Co. (U.S.A.), Inc. in Deer Park, Texas in March of 2019.
2. All records related to Intercontinental Terminals Company, LLC ("ITC").
3. All records related to Mitsui & Co. (U.S.A.), Inc.
4. All records related to the chemicals stored at petrochemical terminal facility ("ITC Facility") in Deer Park, Texas.
5. All records related to the chemicals released from the petrochemical terminal facility ("ITC Facility") in Deer Park, Texas.
6. All records related to any fires at the ITC Facility in 2019.
7. All records related to any fires at the ITC Facility since 2000.
8. All communications in any form between the U.S. Environmental Protection Agency ("EPA") and Channel Industries Mutual Aid ("CIMA") regarding the fires at the Deer Park ITC Facility in March of 2019.
9. All communications in any form between the EPA and the Center for Chemical Process Safety ("CCPS") regarding the fires at the Deer Park ITC Facility in 2019.
10. All communications in any form between the EPA and the Deer Park Police Department regarding the fires at the Deer Park ITC Facility in 2019.
11. All communications in any form between the EPA and the Harris County Fire Marshal's Office regarding the fires at the Deer Park ITC Facility in 2019.
12. All communications in any form between the EPA and the Texas State Fire Marshal regarding the fires at the Deer Park ITC Facility in 2019.
13. All communications in any form between the EPA and the Office of Texas State Chemist regarding the fires at the Deer Park ITC Facility in 2019.
14. All communications in any form between the EPA and the Harris County Sheriff's Office regarding the fires at the Deer Park ITC Facility in 2019.

15. All communications in any form between the EPA and the City of City of Deer Park regarding the fires at the Deer Park ITC facility in 2019.
16. All communications in any form between the EPA and Intercontinental Terminals Company, LLC ("ITC") regarding the fires at the Deer Park ITC Facility in 2019.
17. All communications in any form between the EPA and Mitsui & Co. (U.S.A.), Inc. regarding the fires at the Deer Park ITC Facility in 2019.
18. Any audio recordings or transcripts of audio for any calls received by the EPA related to the fires at the Deer Park ITC Facility in March of 2019.
19. All records, including citations pleadings, releases or settlement agreements and deposition transcripts related to any lawsuit in which Intercontinental Terminals Company, LLC ("ITC") and/or Mitsui & Co. (U.S.A.), Inc. was a party within the last 30 years.